

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC.

Plaintiff

v.

Civil Action No.: 1:20-CV-12229

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC., UMUOJI
IMPROVEMENT UNION, MASSACHUSETTS,
INC., VICTOR IDE OKOYE and OGOR OKOYE

Defendants

PLAINTIFF'S MOTION FOR CONTEMPT AGAINST DEFENDANTS

NOW COMES the plaintiff, Umuoji Improvement Union (North America), Inc. ("UIU"), and hereby requests that the defendants, Umuoji Improvement Union (North America), Inc. ("UIU 2"), Umuoji Improvement Union, Massachusetts ("UIU Mass"), Inc., Victor Ide Okoye, and Ogor Okoye, be held in contempt for knowingly disobeying the Court's unambiguous Order and that UIU be granted the following relief:

1. That the defendants be adjudged in Contempt of the Court's clear and unambiguous Order;
2. That the court permanently enjoin the defendants from continuing to act as UIU's agents or representative or to continue to use UIU's name or any name that is likely to cause confusion among UIU members and donors;
3. That the Court order the defendants' to immediately dissolve UIU 2 (now named Umuoji Improvement Union (USA/Canada) Inc.) and UIU Mass; or, in the alternative, appoint a receiver to oversee the dissolution of said entities;

4. That the defendants be jointly liable to UIU for its costs and legal fees in these contempt proceedings, and in seeking to have their contempts purged; and

5. That the Court award such other relief as this Court deems just and proper.

Respectfully submitted,

UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC.,

Plaintiff,

By its attorney,

/s/ Travis T. Pregent
Travis T. Pregent (BBO: 682998)
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Dated: October 26, 2021

CERTIFICATION

I certify that I have served this document via Notice of Electronic Filing for parties and counsel on the date set forth below in accordance with the Federal Rules of Civil Procedure and this Court's Local Rules.

/s/ Travis T. Pregent
Travis T. Pregent

Date: October 26, 2021